

August 5, 2025

## REQUEST FOR SANCTION

Judge Liman,

I - Mario Armando Lavandeira, Jr., known professionally as Perez Hilton - write as a subpoenaed nonparty in Lively v. Wayfarer Studios LLC (1:24-cv-10049) to inform the Court of a factual inaccuracy.

In docket number 555 - filed yesterday, the OMNIBUS BRIEF IN SUPPORT OF PLAINTIFF BLAKE LIVELY'S MOTIONS TO COMPEL, Michael Gottlieb shared a misrepresentation about me that I believe is a lie.

Ms. Lively's lawyer wrote: *"Meanwhile, third parties have produced materials indicating such communications exist, (Exs. 24 at 2-3; 27 at 3), and the content providers have discussed receiving information from the Wayfarer Defendants' counsel. 19"*

Footnote 19 was a link to a video I made, which can be found here:

[https://www.reddit.com/r/teamjustinbaldoni/comments/1ll7har/exclusive\\_major\\_victory\\_for\\_justin\\_baldoni/](https://www.reddit.com/r/teamjustinbaldoni/comments/1ll7har/exclusive_major_victory_for_justin_baldoni/)

For the record, I NEVER said I received the information shared in the referenced video from Bryan Freedman or anyone at his law firm, as Mr. Gottlieb would erroneously like you to believe. I explicitly stated that I got my exclusive intel from a Baldoni source, but I did not disclose the identity of that source - nor would I ever.

I believe this kind of misleading behavior from Lively's legal team is deplorable and unethical. I also believe strongly that it is a sanctionable offense and I urge the court to hold Mr. Gottlieb accountable - using your inherent power to sanction.

However, given your clear bias in favor of Ms. Lively, I know the likelihood of that happening is slim to none.

Submitted,

/s/ Mario Armando Lavandeira, Jr.

Mario Armando Lavandeira, Jr.

aka Perez Hilton